

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA, *ex rel.*
ALEX DOE, Relator, THE STATE OF
TEXAS, *ex rel.* ALEX DOE, Relator, THE
STATE OF LOUISIANA, *ex rel.* ALEX DOE,
Relator,

Plaintiffs,

V.

PLANNED PARENTHOOD FEDERATION
OF AMERICA, INC., PLANNED
PARENTHOOD GULF COAST, INC.,
PLANNED PARENTHOOD OF GREATER
TEXAS, INC., PLANNED PARENTHOOD
SOUTH TEXAS, INC., PLANNED
PARENTHOOD CAMERON COUNTY,
INC., PLANNED PARENTHOOD SAN
ANTONIO, INC.,

Defendants.

No. 2:21-cv-022-Z

Date: September 1, 2023

EXHIBIT D

From: [Will Wassdorf](#)
To: [Martin, Meghan C.](#); [Andrew Stephens](#); [Amy Hilton](#); [Heather Hacker](#); [Takakjian, Katie](#); [Carrie Killion](#); [Drew Wright](#); [Rhonda Rodriguez](#); [Christopher Hilton](#); [Janice Garrett](#); [Jennifer Rowell](#); [Margolis, Craig D.](#); [Odell, Christopher M.](#); [Sheehan, Christian](#); [Winter, Zachary](#); [ryan@ryanbrownattorneyatlaw.com](#)
Cc: [zzz.External.lgodesky@omm.com](#); [zzz.External.dashby@omm.com](#); [zzz.External.rgalin@omm.com](#); [Whisler, Megan](#); [Gerstner, Alyssa](#); [Reeder-Ricchetti, Emily](#); [Lollar, Tirzah](#)
Subject: RE: U.S. ex rel. Doe v. Planned Parenthood, No. 2:21-cv-00022-Z -- Affiliate Defendants Claw back Production
Date: Wednesday, June 21, 2023 3:13:45 PM
Attachments: [image001.png](#)

External E-mail

Confirmed for the State of Texas.

William D. Wassdorf

Assistant Attorney General
Office of the Attorney General
General Litigation Division
(512) 936-1666
will.wassdorf@oag.texas.gov

From: Martin, Meghan C. <Meghan.Martin@arnoldporter.com>
Sent: Wednesday, June 21, 2023 11:28 AM
To: Andrew Stephens <andrew@hackerstephens.com>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Takakjian, Katie <ktakakjian@omm.com>; Carrie Killion <Carrie.Killion@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Rhonda Rodriguez <Rhonda.Rodriguez@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Janice Garrett <Janice.Garrett@oag.texas.gov>; Jennifer Rowell <Jennifer.Rowell@oag.texas.gov>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Winter, Zachary <Zachary.Winter@arnoldporter.com>; ryan@ryanbrownattorneyatlaw.com; Will Wassdorf <Will.Wassdorf@oag.texas.gov>
Cc: lgodesky@omm.com; dashby@omm.com; rgalin@omm.com; Whisler, Megan <mwhisler@omm.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>
Subject: RE: U.S. ex rel. Doe v. Planned Parenthood, No. 2:21-cv-00022-Z -- Affiliate Defendants Claw back Production

Thanks, Andrew.

I received a bounce back from the format I used for Will Wassdorf's email but have updated his email in this email. I apologize for any inconvenience.

Meghan Martin

Attorney and Advisor | Bio



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From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Wednesday, June 21, 2023 12:06 PM

To: Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Takakjian, Katie <ktakakjian@omm.com>; Carrie Killion <Carrie.Killion@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Rhonda Rodriguez <Rhonda.Rodriguez@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Janice Garrett <Janice.Garrett@oag.texas.gov>; Jennifer Rowell <Jennifer.Rowell@oag.texas.gov>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Winter, Zachary <Zachary.Winter@arnoldporter.com>; ryan@ryanbrownattorneyatlaw.com; <mailto:will.wassdorf@oag.texas.gov> <will.wassdorf@oag.texas.gov>

Cc: zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.dashby@omm.com <dashby@omm.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>; Whisler, Megan <mwhisler@omm.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>
Subject: RE: U.S. ex rel. Doe v. Planned Parenthood, No. 2:21-cv-00022-Z -- Affiliate Defendants Claw back Production

External E-mail

confirmed

Andrew

From: Martin, Meghan C. <Meghan.Martin@arnoldporter.com>

Sent: Wednesday, June 21, 2023 10:57 AM

To: Andrew Stephens <andrew@hackerstephens.com>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Takakjian, Katie <ktakakjian@omm.com>; Carrie Killion <Carrie.Killion@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Rhonda Rodriguez <Rhonda.Rodriguez@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Janice Garrett <Janice.Garrett@oag.texas.gov>; Jennifer Rowell <Jennifer.Rowell@oag.texas.gov>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Winter, Zachary <Zachary.Winter@arnoldporter.com>; ryan@ryanbrownattorneyatlaw.com; <mailto:will.wassdorf@oag.texas.gov> <will.wassdorf@oag.texas.gov>

Cc: lgodesky@omm.com; dashby@omm.com; rgalin@omm.com; Whisler, Megan <mwhisler@omm.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>
Subject: RE: U.S. ex rel. Doe v. Planned Parenthood, No. 2:21-cv-00022-Z -- Affiliate Defendants Claw back Production

Good morning –

Now that things on this case on moving again, I wanted to follow-up on my below email from April 25. Please confirm Relator and Texas have segregated or destroyed all non-redacted copies of clawed back document PPGT00029969?

Regards,
Meghan

Meghan Martin
Attorney and Advisor | [Bio](#)



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From: Martin, Meghan C.

Sent: Tuesday, April 25, 2023 4:17 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Takakjian, Katie <ktakakjian@omm.com>; Carrie Killion <Carrie.Killion@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Rhonda Rodriguez <Rhonda.Rodriguez@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Ana Aranda <Ana.Aranda@oag.texas.gov>; Janice Garrett <Janice.Garrett@oag.texas.gov>; Jennifer Rowell <Jennifer.Rowell@oag.texas.gov>; Michael Moore <Michael.Moore@oag.texas.gov>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Winter, Zachary <Zachary.Winter@arnoldporter.com>; ryan@ryanbrownattorneyatlaw.com

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Andrew, Heather, and Chris –

Can you please confirm Plaintiffs have segregated or destroyed all non-redacted copies of this document?

Thank you
Meghan

Meghan Martin

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From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Tuesday, April 25, 2023 3:51 PM

To: Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Takakjian, Katie <ktakakjian@omm.com>; Carrie Killion <Carrie.Killion@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sindy Chandy <Sindy.Chandy@oag.texas.gov>; Rhonda Rodriguez <Rhonda.Rodriguez@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Ana Aranda <Ana.Aranda@oag.texas.gov>; Janice Garrett <Janice.Garrett@oag.texas.gov>; Jennifer Rowell <Jennifer.Rowell@oag.texas.gov>; Michael Moore <Michael.Moore@oag.texas.gov>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Winter, Zachary <Zachary.Winter@arnoldporter.com>; ryan@ryanbrownattorneyatlaw.com

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Thanks, Meghan.

Andrew

From: Martin, Meghan C. <Meghan.Martin@arnoldporter.com>

Sent: Tuesday, April 25, 2023 10:25 AM

To: Amy Hilton <Amy.Hilton@oag.texas.gov>; Andrew Stephens <andrew@hackerstephens.com>;

Heather Hacker <heather@hackerstephens.com>; Takakjian, Katie <ktakakjian@omm.com>; Carrie Killion <Carrie.Killion@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>; Rhonda Rodriguez <Rhonda.Rodriguez@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Ana Aranda <Ana.Aranda@oag.texas.gov>; Janice Garrett <Janice.Garrett@oag.texas.gov>; Jennifer Rowell <Jennifer.Rowell@oag.texas.gov>; Michael Moore <Michael.Moore@oag.texas.gov>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Sheehan, Christian <Christian.Sheehan@arnoldporter.com>; Winter, Zachary <Zachary.Winter@arnoldporter.com>; ryan@ryanbrownattorneyatlaw.com
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Andrew, Heather and Chris –

It has come to Affiliate Defendants' attention that the document produced at bates number PPGT00029969 is a privileged document that should be clawed back. Attached please find a zip file (PPGT021) containing a newly redacted version of the document as well as a new privilege log with an entry for the document.

The password for the zip file is Myo61Uk*t\$B23SRf

Regards,
Meghan

Meghan Martin
Attorney and Advisor | [Bio](#)



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